1 2 3 4 5 6 7	Robert M. Tzall The Law Offices of Robert M. Tzall 7735 Commercial Way Suite 100 Henderson, NV 89011 Tel: 702-666-0233 Fax: 646-355-0748 robert@tzalllegal.com Nevada State Bar No. 13412			
8				
9	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA			
10	FOR THE DIST	RICI OF NEVADA		
11	SHANIA LIVERPOOL,	) Docket No.		
12	Plaintiff,	COMPLAINT AND DEMAND FOR		
13	VS.	TRIAL BY JURY		
14 15	COAST TO COAST FINANCIAL SOLUTIONS, INC.,			
16	Defendant			
17		_		
18				
19	Plaintiff Shania Liverpool ("Plaintiff") by and through his attorneys, The Law Offices of			
20	Robert M. Tzall as and for his Complaint against Defendant Coast to Coast Financial Solutions,			
21	Inc., ("Defendant") respectfully sets forth, complains and alleges, upon information and belief,			
22	the following:			
23				
24	JURISDICT	ION AND VENUE		
25	JURISDICTION AND VENUE			
26	1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as well as 15			
27	U.S.C. § 1692 <i>et seq</i> . and 28 U.S.C. § 3	2201.		
28	2. Venue is proper in this judicial district	pursuant to 28 U.S.C. § 1391(b)(2).		

3. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of 15 U.S.C. § 1692 *et seq.*, commonly known as the Fair Debt Collections Practices Act ("FDCPA").

## **PARTIES**

- 4. Plaintiff is a resident of the State of Nevada, residing in the County of Clark.
- 5. Defendant is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA, with an address at 101 Hodencamp Rd., #120, Thousand Oaks, CA 91360.

## **FACTUAL ALLEGATIONS**

- 6. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein with the same force and effect as if the same were set forth at length herein.
- 7. On information and belief, on a date better known to Defendant, Defendant began collection activities on an alleged consumer debt from the Plaintiff ("Alleged Debt").
- 8. The Alleged Debt was incurred as a financial obligation that was primarily for personal, family or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).
- 9. On or around June 25, 2015, Defendant sent a letter (the "Letter") to Plaintiff, seeking collection of the Alleged Debt. Plaintiff received the Letter.
- 10. The Letter included an online payment option, which applied a \$2.00 fee.
- 11. The addition of the online payment fee is not expressly authorized by the agreement creating the Alleged Debt, nor is it otherwise permitted by law.

12	. As a result of Defendant's improper debt collection practices described above, Plaintiff
	has been damaged.
	FIRST CAUSE OF ACTION (Violations of the FDCPA)
13	. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though
	fully stated herein with the same force and effect as if the same were set forth at length
	herein.
14	. Defendant's debt collection efforts attempted and/or directed towards Plaintiff violate
	various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692e,
	1692e(2)(B), 1692e(10), 1692f, and 1692f(1).
15	. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is
	entitled to damages in accordance with the FDCPA.
	DEMAND FOR TRIAL BY JURY
16	. Plaintiff demands and hereby respectfully requests a trial by jury for all claims and issues
	in this complaint to which Plaintiff is or may be entitled to a jury trial.
	2
	- 3 -

1	PRAYER FOR RELIEF
2	WHEREFORE, Plaintiff demands judgment from the Defendant as follows:
3	a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
4	b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
5	c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3); and
6	d) For any such other and further relief, as well as further costs, expenses and
7	disbursements of this action as this Court may deem just and proper.
8	disoursements of this action as this Court may accini just and proper.
10	
11	DATED, this 31st day of March, 2016
12	/s/Robert M. Tzall
13	Robert M. Tzall <b>The Law Offices of Robert M. Tzall</b>
14	Attorneys for Plaintiff
15	
16	
17	
18	
19	
20	
21 22	
23	
24	
25	
26	
27	
28	<u>.</u>
	- $arDelta$ -